

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

FETHI HEPCAKICI, JR.,

Plaintiff,

v.

PILOT TRAVEL CENTERS, LLC, a Foreign
Limited Liability Company, operating in
Washington,

Defendant.

Case No. 3:24-cv-5706

STIPULATED MOTION AND ORDER
TO WAIVE FRCP 26 INITIAL
DISCLOSURES

STIPULATED MOTION TO WAIVE INITIAL DISCLOSURES

Plaintiff Fethi Hepcakici and defendant Pilot Travel Centers, LLC (together,
the “Parties”), by and through their undersigned counsel, hereby jointly move the Court for an
order waiving the requirement for the exchange of initial disclosures pursuant to Fed. R. Civ. P.
26(a)(1) and the Local Civil Rules of the Western District of Washington. In support of this
motion, the Parties state as follows:

1. Background

The Parties are currently in the early stages of litigation in this case and have conferred
regarding the need for initial disclosures. The Parties agree that the exchange of initial
disclosures is unnecessary at this time based on the nature of the claims, the anticipated
discovery process, and their agreement to streamline discovery.

///

2. Justification for Waiver

The Parties have conferred and mutually agreed that initial disclosures, as required under Fed. R. Civ. P. 26(a)(1), are not necessary for the efficient resolution of this matter at this time. Specifically, both Parties believe that the issues in dispute can be better clarified through targeted discovery, and that waiving the initial disclosure requirement will save time and resources for both the Court and the Parties. This stipulation will not prejudice either party's ability to obtain relevant discovery through other means.

3. Compliance with LCR 10(g)

This stipulated motion is being filed pursuant to Local Civil Rule 7(d)(1) because the Parties seek a court order to waive the requirement for initial disclosures. The proposed waiver does not alter any dates or schedules previously set by the Court, and thus no other scheduling changes are proposed.

4. Agreement of the Parties

The Parties jointly stipulate to the waiver of the requirement for initial disclosures and request the Court's approval of this stipulation.

WHEREFORE, the Parties respectfully request that the Court enter an order waiving the requirement for initial disclosures under Fed. R. Civ. P. 26(a)(1) in this matter.

Dated: November 13, 2024.

Respectfully submitted,

s/ *Kyle Sciuchetti*

Kyle Sciuchetti, WSBA No. 26264

Miller Nash LLP

Kyle.sciuchetti@millernash.com

s/ *Robert J. Blazak*

Robert J. Blazak WSBA No. 13796


Blazak Law

rjb@blazaklaw.com

ORDER

IT IS SO ORDERED that the requirement for initial disclosures under Fed. R. Civ. P. 26(a)(1) is hereby waived in this case.

Dated this 3rd day of December, 2024.



David G. Estudillo
United States District Judge